REMARKS

As a preliminary matter, the Examiner indicates that the Information Disclosure Statements filed April 30 and May 1, 2003 fail to comply with 37 C.F.R. § 1.97(c), because the required fee or statement was not included. Applicants did file an IDS on April 28, 2003, but not on the dates mentioned by the Examiner. Since the IDS was filed only a few days after the date of the Office Action, Applicants were not aware that there was an Office Action in the present application. Thus, at the time of filing the IDS, Applicant did not include the statement or the fee. However, since the Office Action is dated prior to the filing of the IDS, Applicants submit herewith the required fee.

Claims 1-51 are pending in the application, but claims 38-51 have been withdrawn from consideration as being directed to a non-elected species. Thus, claims 1-37 have been examined.

Claims 1-26 and 28-32 are rejected under 35 U.S.C. § 102(e) as being anticipated by Ferret (US 6,430,553). Claims 33 and 34 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Ferret in view of Brady et al. (US 6,463,430, hereafter "Brady"). Claims 27 and 35-37 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Ferret in view of Hoffert (US 5,903,892). Applicants respectfully traverse the rejections with the following comments.

The present invention relates to classification of multimedia data, and more particularly, to a database building method for multimedia data (hereinafter, referred to as multimedia contents) in which multimedia contents are semantically classified and stored in a predetermined database.

Ferret relates to a computer implemented method and a computer program product for parsing information obtained during a computerized search. The computer implemented method and computer program product (collectively "the parsing engine") is one of two modules of a specialized search engine. The search engine includes a query engine and the parsing engine. The query engine seeks out and queries web sites for specific information and the parsing engine parses structured text received as a result of the queries to extract the requested information. The text obtained from the web sites may or may not be the result of a query from the query engine. Therefore, the parsing engine is operable separately from the query engine and stands as an independent computer implemented method.

Brady relates to an apparatus for generating and updating databases for the retrieval of information. An automated method of creating or updating a database of resumes and related documents, according to Brady comprises: a) entering at least one example document that is relevant to a subject taxonomy in a retrieval priority list, if there is a plurality of example documents stored in the retrieval priority list, ranking the example documents according to the relevancy of the example documents to the subject taxonomy; b) retrieving a document from a network of documents, where the document is the most relevant document to the subject taxonomy stored in the retrieval priority list; c) harvesting information from specified fields of the document; d) classifying the information into one or more classes according to specified categories of the subject taxonomy; e) storing the information into a database; f) determining whether the information are links to other documents; g) ranking the link's according to relevancy to the subject taxonomy, and storing the links in the retrieval priority list according to

the relevancy; h) terminating the method, provided the method's stop criteria have been met; and

i) repeating steps b) through h), provided the method's stop criteria has not been met.

Hoffert relates to a method and apparatus for searching for multimedia files in a

distributed database and for displaying results of the search based on the context and content of

the multimedia files.

For the rejection of claims 1-26 and 28-32, Applicants submit that Ferret does not teach

or suggest all of the limitations of the claims. Specifically, Ferret fails to disclose the features of

claim 1 of classifying the multimedia contents data according to stored addresses and storing the

multimedia contents data in a predetermined database. The Examiner cites col. 1, line 65 - col.

2, line 5, as allegedly disclosing this feature of the claim. The cited excerpt states the following:

> f) parsing the information received from the one or more
> remote computers using the meta-language instructions to form parsed
> information; g) grouping the parsed information into at least one set of
> aggregated information; and h) delivering the aggregated information
> to the requesting computer.
> It is preferred that the computer implemented method include
> the step of filtering information.

Applicants submit that the cited excerpt does not disclose or suggest classifying the

multimedia contents data according to stored addresses. Rather, Ferret discloses parsing

received information using the meta-language instructions. As disclosed at col. 7, lines 31-33,

"[t]he meta-language instructions are a set of commands that instruct the parsing engine to

perform a variety of search and extraction operations." Hence, the meta-language instructions do

not correspond to the stored addresses of claim 1. Furthermore, nothing in the cited excerpt

corresponds to the feature of classifying the multimedia contents data according to stored

addresses.

Also, Ferret does not disclose storing the multimedia contents data in a predetermined

database, as recited in claim 1. The cited excerpt discloses grouping the parsed information into

at least one set of aggregated information and delivering the aggregated information to the

requesting computer, but neither of these operations correspond to storing the multimedia

contents data in a predetermined database. The cited excerpt does not disclose storing

multimedia contents data. Moreover, the excerpt does not disclose storing the multimedia

contents data in a predetermined database.

Therefore, claim 1 and its dependent claims 2-14 are not anticipated by Ferret, for at least

the above-described reasons.

Independent claim 15 recites storing called multimedia contents data to a predetermined

database, using a categorized structure. For reasons analogous to those presented above in

relation to claim 1, Applicants submit that Ferret fails to teach or suggest this feature of claim 15.

Thus, claim 15 and its dependent claims 16-25 are not anticipated Ferret.

For reasons analogous to those presented above for claim 1, Applicants submit that

independent claim 26 and its dependent claims 28-32 are not anticipated by Ferret.

With further regard to claims 10, 21, and 30, Applicants submit that Ferret does not teach

or suggest all of the limitations of these claims. Here, the Examiner refers to col. 8, lines 35-40

of Ferret. However, this portion of the reference is directed to a numerical filter that tells the

engine to discard an item if the numerical value given in the filter command greater than, less

than, or equal to the value of one of the item's fields. Neither this portion of the reference, nor

any other part of Ferret discloses determining whether or not the <u>pixel number</u> of a called image

is equal to or greater than a predetermined threshold value. Ferret does not describe the use of

pixel numbers at all. Hence, claims 10, 21, and 30 are not anticipated by Ferret for this

additional reason.

Also, Ferret does not disclose that the predetermined threshold value is 128, as recited in

claims 11 and 22. The portion of Ferret referred to by the Examiner as allegedly disclosing this

feature of the claims, simply does not make the alleged disclosure. Thus, claims 11 and 22 are

not anticipated by Ferret for this additional reason.

With regard to claims 12, 23, and 32, Applicants submit that Ferret fails to teach or

suggest all of the limitations of these claims. In particular, Ferret does not disclose decreasing

resolution of the called multimedia contents, as recited in claim 12; decreasing the resolution of

the called image data, as recited in claim 23; and a resolution decreasing unit for decreasing

resolution of the filtered image, as recited in claim 32. The excerpt cited by the Examiner (col.

6, lines 25-30), as well as the remainder of the reference, simply do not disclose these features of

the claims. In fact, Ferret does not seem to disclose anything about decreasing resolution.

Accordingly, claims 12, 23, and 32 are not anticipated by Ferret for this reason too.

Claims 33 and 34 are rejected over Ferret in view of Brady. Claims 33 and 34 are

allowable over the prior art, at least because Brady fails to make up for the deficiencies of Ferret

noted above.

Also, Brady fails to disclose the limitations of claims 33 and 34, which the Examiner

admits are missing from Ferret. The Examiner cites col. 3, lines 5-10, of Brady as allegedly

disclosing the features of claims 33 and 34. However, this portion of the reference makes the
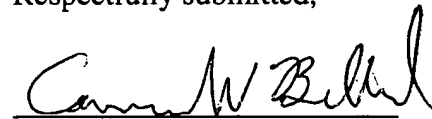
very general disclosure of "terminating the method, provided the method's stop criteria have

been met" and "repeating steps b) through h), provided the method's stop criteria has not been

met." Brady does not disclose the feature of claim 33 of wherein it is determined whether or not

a number of indexed multimedia contents is equal to or greater than a predetermined number.

Brady's disclosure is much more general than that. Hence, claims 33 and 34, which depend from

claim 33, are allowable over the prior art for this reason as well.

Claims 27 and 35-37 are rejected over Ferret in view of Hoffert. These claims are

allowable over the prior art, at least because Hoffert fails to make up for the deficiencies of

Ferret noted above in relation to independent claim 26, from which claims 27 and 35-37 depend.

In view of the above, reconsideration and allowance of this application are now believed

to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is

kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue

Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any

overpayments to said Deposit Account.

Respectfully submitted,

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7